

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOYCE HUTCHENS,	)	
	)	
Plaintiff,	)	<b>Case No. 13-6447</b>
	)	
v.	)	
	)	
CHICAGO BOARD OF EDUCATION	)	
	)	
Defendant.	)	

**PLAINTIFF'S RULE 26(a)(1) DISCLOSURES**

Plaintiff, JOYCE HUTCHENS, pursuant to Federal Rule of Civil Procedure 26 (a)(1), makes the following initial disclosures:

(A) DISCOVERABLE INFORMATION

The following individuals have knowledge of the subject of this matter:

Plaintiff

Learning Pointe Associates, Naperville, IL (now American Institute of Research)  
1120 East Diehl Road, Suite 200  
Naperville, IL 60563

Truman Middle College (actually, Chicago City Colleges)  
Mary Ann Soley, Principal  
Truman Middle College (Chicago City Colleges)  
1145 W. Wilson Avenue, #3985  
Chicago, IL 60640

The Safer Foundation, Chicago, IL  
571 W. Jackson Blvd  
Chicago, IL 60661

Robert Hennen, Operations Manager  
The Princeton Review  
2801 North Sheffield Avenue  
Chicago, IL 60657

Scott Lorch (out of Indianapolis)  
Briljent Corporation  
7615 W Jefferson Blvd  
Fort Wayne, IN 46804

Allison & Taylor Reference Checking, Inc.  
Attn: Sue  
Phone: (800) 890-5645

Gina Marlow  
Maria (last name unknown)  
Employee Records Department  
Board of Education

Any persons identified by the Defendant.

Investigation continues.

(B) RELEVANT DOCUMENTS

Relevant documents are attached to Plaintiff's Complaint, except that the Board already has in its possession all documents relevant to the previously filed complaint in *Hutchens v. Board*, Case No. 09 C 7931. Investigation continues.

(C) APPROXIMATE DAMAGES

Plaintiff seeks a permanent injunction ordering the Defendant to provide potential employers with timely, professional reference and employment verification information, compensatory damages in an amount in excess of \$300,000, punitive damages as allowed by law, all wages and benefits Plaintiff would have received but for the unlawful discrimination and retaliation, including pre-judgment interest, and an award of attorney's fees and costs and expenses of this litigation.

Respectfully submitted,  
JOYCE HUTCHENS

/s/ Deidre Baumann

By: One of His Attorneys

Deidre Baumann  
Baumann & Shuldiner  
20 South Clark Street, Suite 500  
Chicago, IL 60603

(312) 558-3119